

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**JOHN P. BOYD,**

**Plaintiff**

**vs.**

**MAHROUQ ENTERPRISES  
INTERNATIONAL (MEI), INC.,**

**Defendant**

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**Civil Action No. 4:21-CV-00732-O**

**DEFENDANT’S ORIGINAL ANSWER**

Defendant Mahrouq Enterprises International (MEI), Inc. files this Original Answer to Plaintiff’s Original Complaint. Defendant is not the holder of the referenced debt and respectfully submits that Plaintiff may have sued the wrong party.

1. No response to Paragraph No. 1 is required.
2. Defendant admits the allegations in Paragraph No. 2.
3. Defendant admits the allegations in Paragraph No. 3.
4. Defendant admits the allegations in Paragraph No. 4.
5. With respect to the allegations contained in Paragraph No. 5, Defendant admits Plaintiff is a natural person over the age of 18 but lacks knowledge and information sufficient to form a belief as to the truth of the remainder of this paragraph.
6. Defendant admits the allegations in Paragraph No. 6.
7. Defendant admits the allegations in Paragraph No. 7.
8. Defendant admits the allegations in Paragraph No. 8.
9. Defendant admits the allegations in Paragraph No. 9.
10. Defendant admits the allegations in Paragraph No. 10.

11. Defendant admits the allegations in Paragraph No. 11.

12. Defendant admits the allegations in Paragraph No. 12.

13. Defendant lacks knowledge and information sufficient to form a belief as to the truth of the assertions in Paragraph No. 13.

14. Defendant lacks knowledge and information sufficient to form a belief as to the truth of the assertions in Paragraph No. 14.

15. Defendant lacks knowledge and information sufficient to form a belief as to the truth of the assertions in Paragraph No. 15.

16. Defendant admits the allegations in Paragraph No. 16.

17. With respect to the allegations contained in Paragraph No. 17, Defendant admits the Plaintiff fell behind on payments but lacks knowledge and information sufficient to form a belief as to the truth of the remainder of this paragraph.

18. Defendant admits the allegations in Paragraph No. 18.

19. With respect to the allegations contained in Paragraph No. 19, Defendant admits the subject debt fell into default on numerous occasions but lacks knowledge and information sufficient to form a belief as to the truth of the allegation that Plaintiff cured the default “on most occasions.”

20. Defendant denies the allegations in Paragraph No. 20.

21. Defendant denies the allegations in Paragraph No. 21.

22. Defendant denies the allegations in Paragraph No. 22.

23. Defendant denies the allegations in Paragraph No. 23.

24. Defendant denies the allegations in Paragraph No. 24.

25. Defendant denies the allegations in Paragraph No. 25.

26. Defendant denies the allegations in Paragraph No. 26.

27. Defendant denies the allegations in Paragraph No. 27.

28. Defendant denies the allegations in Paragraph No. 28.

29. Defendant denies the allegations in Paragraph No. 29.

30. Defendant denies the allegations in Paragraph No. 30.

31. Defendant denies the allegations in Paragraph No. 31.

32. Defendant denies the allegations in Paragraph No. 32.

33. No response to Paragraph No. 33 is required.

34. With respect to the allegations contained in Paragraph No. 34, Defendant admits that this is a quote from the cited case.

35. Defendant denies the allegations in Paragraph No. 35.

36. Defendant denies the allegations in Paragraph No. 36.

37. Defendant denies the allegations in Paragraph No. 37.

38. Defendant denies the allegations in Paragraph No. 38.

39. Defendant denies the allegations in Paragraph No. 39.

40. Defendant denies the allegations in Paragraph No. 40.

41. No response to Paragraph No. 41 is required.

42. Defendant admits the allegations in Paragraph No. 42.

43. Defendant denies the allegations in Paragraph No. 43.

44. Defendant denies the allegations in Paragraph No. 44.

45. With respect to the allegations contained in Paragraph No. 45, Defendant admits that these are provisions of the cited statute.

#### **REQUEST FOR RELIEF**

**WHEREFORE**, Defendant asks the Court to enter judgment as follows:

- (1) Ordering that Plaintiff take nothing.
- (2) Dismissing Plaintiff's suit with prejudice.

- (3) Assessing costs against Plaintiff.
- (4) Awarding attorney fees to Defendant.
- (5) Granting all other relief requested by Defendant herein.
- (6) Granting general relief to Defendant.

Respectfully submitted,



**GREY PIERSON**

**State Bar No. 16002500**

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**Attorneys for Defendant**

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing has been served on all counsel of record by transmitting a true copy of same to such persons pursuant to the FEDERAL RULES OF CIVIL PROCEDURE on this date, July 8, 2021.



**GREY PIERSON**